



November 16, 2004

FILED VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte Presentation: New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35*

Dear Ms. Dortch,

Yesterday, Dennis Guard, Perry Taylor and Kevin Gahan (by telephone) of MCI, Inc. ("MCI") met with Jeff Goldthorp, Kent Nilsson, John Healy, and David Ahn of the Network Technology Division of the Federal Communications Commission's ("FCC" or "Commission") Office of Engineering Technology. The purpose of the meeting was to discuss and get clarification on a number of issues raised by the Commission's *Report and Order*¹ in the above-referenced proceeding.

In the meeting, MCI specifically sought clarification on – and highlighted its concerns relating to – the Commission's new requirement for reporting events that entail a loss of diversity (i.e., path-protect routing). MCI highlighted that, as written, this requirement could result in thousands of additional reports. This additional burden would drain valuable resources while providing the Commission with information of questionable value. MCI additionally sought clarification on several issues relating to airports, including triggering events for reporting. Clarification was also sought on several matters relating to confidentiality of outage filings. Finally, MCI discussed several technical issues associated with the reporting process and template.

¹ *New Part 4 of the Commission's Rules Concerning Disruptions to Communications, Report and Order and Further Notice of Proposed Rule Making, ET Docket No. 04-35, FCC 04-188 (rel. Aug. 19, 2004) ("Report and Order").*

Ms. Marlene Dortch
November 16, 2004
Page 2 of 2

Please do not hesitate to call me at the above number should you have any questions.

Sincerely

Dennis Guard

Dennis Guard

cc: Jeff Goldthorp, FCC (via email)
Kent Nilsson, FCC (via email)
John Healy, FCC (via email)
David Ahn, FCC (via email)